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8 **BEFORE THE**  
9 **BOARD OF REGISTERED NURSING**  
10 **DEPARTMENT OF CONSUMER AFFAIRS**  
11 **STATE OF CALIFORNIA**

12 In the Matter of the Accusation Against:

Case No. 2012-2

13 **KATHLEEN DIANE TIESSEN,**  
14 **aka KATHLEEN DIANE SERON,**  
15 **aka KATHLEEN DIANE DOWELL**  
16 **P.O. Box 3497**  
17 **Arizona City, AZ 85223**  
18 **Registered Nurse License No. 295797**

**A C C U S A T I O N**

Respondent.

19 Complainant alleges:

**PARTIES**

20 1. Louise R. Bailey, M.Ed., RN ("Complainant") brings this Accusation solely in her  
21 official capacity as the Executive Officer of the Board of Registered Nursing ("Board"),  
22 Department of Consumer Affairs.

23 2. On or about August 31, 1978, the Board issued Registered Nurse License Number  
24 295797 to Kathleen Diane Tiessen, also known as Kathleen Diane Seron and Kathleen Diane  
25 Dowell ("Respondent"). Respondent's registered nurse license was in full force and effect at all  
26 times relevant to the charges brought herein and will expire on January 31, 2012, unless renewed.

**STATUTORY PROVISIONS**

27 3. Business and Professions Code ("Code") section 2750 provides, in pertinent part, that  
28 the Board may discipline any licensee, including a licensee holding a temporary or an inactive

1 license, for any reason provided in Article 3 (commencing with section 2750) of the Nursing  
2 Practice Act.

3 4. Code section 2764 provides, in pertinent part, that the expiration of a license shall not  
4 deprive the Board of jurisdiction to proceed with a disciplinary proceeding against the licensee or  
5 to render a decision imposing discipline on the license. Under Code section 2811, subdivision  
6 (b), the Board may renew an expired license at any time within eight years after the expiration.

7 5. Code section 2761 states, in pertinent part:

8 The board may take disciplinary action against a certified or licensed  
9 nurse or deny an application for a certificate or license for any of the following:

10 (a) Unprofessional conduct . . .

11 . . . .  
12 (4) Denial of licensure, revocation, suspension, restriction, or any other  
13 disciplinary action against a health care professional license or certificate by another  
14 state or territory of the United States, by any other government agency, or by another  
California health care professional licensing board. A certified copy of the decision  
or judgment shall be conclusive evidence of that action . . .

#### 15 COST RECOVERY

16 6. Code section 125.3 provides, in pertinent part, that the Board may request the  
17 administrative law judge to direct a licensee found to have committed a violation or violations of  
18 the licensing act to pay a sum not to exceed the reasonable costs of the investigation and  
19 enforcement of the case.

#### 20 CAUSE FOR DISCIPLINE

##### 21 (Disciplinary Action by the Arizona State Board of Nursing)

22 7. Respondent is subject to disciplinary action pursuant to Code section 2761,  
23 subdivision (a)(4), on the grounds of unprofessional conduct, in that she was disciplined by the  
24 Arizona State Board of Nursing ("Arizona Board"), as follows: On or about November 19, 2010,  
25 pursuant to Consent for Entry of Voluntary Surrender Order No. 1001018 in the disciplinary  
26 proceeding titled "In the Matter of Registered Nurse License No. RN 135006 Issued to: Kathleen  
27 Diane Tiessen", Respondent voluntarily surrendered her license to practice as a registered nurse  
28 in the State of Arizona for a minimum of three years. A true and correct copy of the Order is

1 attached as exhibit A and incorporated herein by reference. Pursuant to the terms of the Order,  
2 Respondent admitted, in substance, as follows:

3 a. From June 7, 2006, to January 15, 2010, Respondent was employed as a school nurse  
4 by the Mary C. O'Brien School District in Pinal County, Arizona.

5 b. On or about October 20, 2009, Respondent allegedly exhibited behaviors of chemical  
6 and/or psychological impairment while on duty. Respondent admitted taking oxycodone the  
7 night before reporting for duty and having an addiction to opiates. Respondent's employment  
8 was terminated for being under the influence of alcohol or non-prescribed drugs.

9 c. On or about October 20, 2009, while hospitalized at Casa Grande Regional Medical  
10 Center in Casa Grande, Arizona, Respondent's drug screen returned positive for amphetamines,  
11 benzodiazepines, and opiates. Respondent's husband told hospital staff that Respondent had a  
12 history of prescription medication overdoses and had been hospitalized in California for mental  
13 health issues.

14 d. On or about October 21, 2009, Respondent was admitted to Sonora Behavioral Health  
15 Hospital in Tucson, Arizona. According to hospital records, Respondent overdosed on 80 mg of  
16 OxyContin, told hospital staff that she had gone through two detoxifications, admitting abusing  
17 both OxyCodone Long Acting and OxyCodone Immediate Release prescription opiates, and  
18 requested to "detox" off of opiates and Xanax. Respondent also told hospital staff that she had  
19 gone through lengthy periods of sobriety with 12-step type programs. On October 23, 2009,  
20 Respondent was discharged with diagnoses of opiate dependence, opiate withdrawal,  
21 benzodiazepine dependence, and anxiety disorder.

22 e. On or about November 6, 2009, Respondent underwent a Fitness for Duty Evaluation  
23 with Dr. Donald J. Gibertini. Dr. Gibertini recommended that Respondent work under close  
24 monitoring for narcotic usage, seek help with a Substance Abuse Professional, and undergo drug  
25 screening. Dr. Gibertini was of the opinion that without a clear plan for drastically limiting her  
26 narcotic pain medication, he had strong reservations about Respondent working in a safety  
27 sensitive position such as a school nurse.

28 ///

1 f. On or about April 7, 2010, Respondent told Arizona Board staff that she took opiates  
2 for long standing chronic pain issues (Respondent's medical records revealed a history of opiate  
3 use for shoulder and hip pain, herniated disks, and scoliosis with pain radiating to the legs).

4 Respondent denied having a prior history of opiate addiction or abuse, and denied being  
5 hospitalized for opiate detoxification as recorded in hospital and occupational health records.

6 g. On July 26, 2010, Respondent underwent a substance abuse evaluation with Dr.  
7 Bethann Mahoney. Dr. Mahoney opined that Respondent has a physical dependence to opiate  
8 medication which has been abused in the past. Dr. Mahoney recommended that Respondent  
9 undergo monitoring of random urine drug screens, neuropsychological evaluation to determine  
10 Respondent's comprehension of issues, and supervised medication administration.

#### 11 MATTERS IN AGGRAVATION

12 8. To determine the degree of penalty to be imposed on Respondent, if any,  
13 Complainant alleges as follows: On December 20, 1982, pursuant to the Stipulation and Decision  
14 adopted by the Board as its decision in the disciplinary proceeding titled "In the Matter of the  
15 Accusation Against: Kathleen Diane Seron, R.N.", Case No. 82-57, the Board revoked  
16 Respondent's registered nurse license effective January 21, 1983. The revocation was stayed and  
17 Respondent was placed on probation for three years on terms and conditions. Respondent  
18 admitted that she falsified and made grossly incorrect and grossly inconsistent entries in records  
19 pertaining to narcotics and dangerous drugs in several instances while employed at Westside  
20 District Hospital, Taft, California.

#### 21 PRAYER

22 WHEREFORE, Complainant requests that a hearing be held on the matters herein alleged,  
23 and that following the hearing, the Board of Registered Nursing issue a decision:

24 1. Revoking or suspending Registered Nurse License Number 295797, issued to  
25 Kathleen Diane Tiessen, also known as Kathleen Diane Seron and Kathleen Diane Dowell;

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28 ///

2. Ordering Kathleen Diane Tiessen, also known as Kathleen Diane Seron and Kathleen Diane Dowell, to pay the Board of Registered Nursing the reasonable costs of the investigation and enforcement of this case, pursuant to Business and Professions Code section 125.3;

3. Taking such other and further action as deemed necessary and proper.

DATED:

July 7, 2011

Louise R. Bailey

LOUISE R. BAILEY, M.ED., RN  
Executive Officer  
Board of Registered Nursing  
Department of Consumer Affairs  
State of California  
*Complainant*

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**EXHIBIT A**

**Consent for Entry of Voluntary Surrender Order No. 1001018**

ARIZONA STATE BOARD OF NURSING  
4747 North 7th Street, Suite 200  
Phoenix, Arizona 85014-3655  
602-771-7800

IN THE MATTER OF REGISTERED  
NURSE LICENSE NO. RN135006  
ISSUED TO:

KATHLEEN DIANE TIESSEN  
RESPONDENT

CONSENT FOR ENTRY OF  
VOLUNTARY SURRENDER  
ORDER NO. 1001018

A complaint charging Kathleen Diane Tiessen ("Respondent") with violation of the Nurse Practice Act has been received by the Arizona State Board of Nursing ("Board"). In the interest of a prompt and speedy settlement of the above-captioned matter, consistent with the public interest, statutory requirements, and the responsibilities of the Board, and pursuant to A.R.S. § 32-1605.01(D), Respondent voluntarily surrenders her license for a minimum of three years.

Based on the evidence before it, the Board makes the following Findings of Fact, Conclusions of Law:

FINDINGS OF FACT

1. Respondent holds Board issued registered nurse license no. RN135006.
2. From on or about June 7, 2006 to on or about January 15, 2010, Respondent was employed as a school nurse by the Mary C. O'Brien School District in Pinal County, Arizona.
3. On or about January 11, 2010, Valerie Gorodensky, Administrator for the Mary C. O'Brien Elementary School, filed a complaint with the Board, alleging that on or about October 20, 2009, Respondent exhibited behaviors of chemical and/or psychological impairment while on duty. Gorodenski said Respondent admitted taking oxycodone the night before reporting for duty and having an addiction to opiates. Respondent was subsequently hospitalized at Sonora Behavioral Health Hospital and diagnosed with opiate and benzodiazepine dependence. Respondent's employment was

terminated for being under the influence of alcohol or non-prescribed drug. Based on this information, the Board conducted an investigation.

4. According to medical records from Casa Grande Regional Medical Center in Casa Grande, Arizona, on or about October 20, 2009, Respondent's drug screen returned positive for amphetamines, benzodiazepines, and opiates. Respondent's husband told hospital staff Respondent had a history of prescription medication overdoses and had been hospitalized in California for mental health issues.

5. On or about October 21, 2009, Respondent was admitted to Sonora Behavioral Health Hospital in Tucson, Arizona. According to hospital records, Respondent overdosed on 80mg of OxyContin (opiate pain medication), told hospital staff she had gone through two detoxifications, admitted abusing both OxyCodone Long Acting and OxyCodone Immediate Release prescription opiates, and requested to detox off of opiates and Xanax (anti-anxiety medication). According to the medical record, Respondent told hospital staff she had gone through lengthy periods of sobriety with the 12-step type programs. On October 23, 2009, Respondent was discharged with diagnoses of opiate dependence, opiate withdrawal, benzodiazepine dependence, and anxiety disorder.

6. On or about November 6, 2009, Respondent underwent a Fitness for Duty Evaluation with Dr. Donald J. Gibertini. According to Dr. Gilbertini's report, Respondent said she had an adverse reaction to Oxycontin she had taken around midnight on October 20, 2009. Respondent stated she had two previous hospitalizations for detoxification of pain medications. Dr. Giblertini recommended Respondent work under close monitoring for narcotic usage, would benefit from help with a Substance Abuse Professional, undergo drug screening, and "without a clear plan for drastically limiting her narcotic pain medication", he had strong reservations about Respondent working in a safety sensitive position such as a school nurse.



7. A Board staff review of Respondent's medical records from her provider Dr. S. Platt between 2008 to April 2010 revealed a history of opiate use for shoulder and hip pain, herniated disks, scoliosis with pain radiating to the legs, and several other medical diagnoses. Respondent had signed a pain management contract.

8. On or about April 7, 2010, Respondent told Board staff she took opiates for long standing, chronic pain issues. She denied having a prior history of opiate addiction or abuse, and denied being hospitalized for opiate detoxification as recorded in hospital and occupational health records.

9. A Board staff review of Respondent's employment records from Mary C. O'Brien Elementary School showed the following issues:

a. Written notes by Dolores Burciaga, administrative assistant, documented staff observations where Respondent experienced occasions of shaking and sweating. Respondent attributed her symptoms to not eating or being under stress.

b. A letter written December 3, 2009 where Sharon Lawrence, RN, Interim School Nurse, documented irregularities found in student medication dispensing and storage, conflicting information between what was written on the label versus what was found pre-poured or documented on the medication signature sheets.

10. On July 26, 2010, Respondent underwent a substance abuse evaluation with Dr. Bethann Mahoney. Dr. Mahoney stated Respondent has a physical dependence to opiate medication which has been abused in the past. Dr. Mahoney recommended Respondent undergo monitoring of random urine drug screens, neuropsychological evaluation to determine Respondent's comprehension of issues, and supervised medication administration.

11. On or about September 22, 2010, the Board voted to offer Respondent a Consent Agreement for a thirty-six month probation, with terms and conditions.

12. On or about November 10, 2010, as communicated to the Board through her attorney, Respondent said she physical health had deteriorated and she would have difficulty meeting the terms of the Consent Agreement.

13. On or about November 12, 2010, Respondent requested to voluntary surrender her license.

### CONCLUSIONS OF LAW

Pursuant to A.R.S. §§ 32-1606, 32-1663, and 32-1664, the Board has subject matter and personal jurisdiction in this matter.

The conduct and circumstances described in the Findings of Fact constitute a violation of A.R.S. § 32-1663 (D) as defined in A.R.S. § 32-1601 (16)(d) (any conduct or practice that is or might be harmful or dangerous to the health of a patient or the public) (effective May 9, 2002) and (j) (violating a rule that is adopted by the board pursuant to this chapter) (effective May 9, 2002), specifically A.A.C. R4-19-403 (B) (7) (failing to maintain for a patient record that accurately reflects the nursing assessment, care, treatment and other nursing services provided to the patient) (effective November 13, 2005) and (13) (failing to supervise a person to whom nursing functions are delegated) (effective November 13, 2005).

The conduct and circumstances described in the Findings of Fact constitute a violation of A.R.S. § 32-1663 (D) as defined in A.R.S. § 32-1601 (18)(d) (any conduct or practice that is or might be harmful or dangerous to the health of a patient or the public) (effective October 14, 2009), (e) (being mentally incompetent or physically unsafe to the degree that is or might be harmful or dangerous to the health of a patient or the public) (effective October 14, 2009) and (j) (violating a rule that is adopted by the board pursuant to this chapter) (effective October 14, 2009), specifically A.A.C. R4-19-403 (1) (a pattern of failure to maintain minimum standards of acceptable and prevailing nursing practice)

(effective February 2, 2009), (17)(a pattern of using or being under the influence of alcohol, drugs, or a similar substance to the extent that judgment may be impaired and nursing practice detrimentally affected, or while on duty in any health care facility, school, institution, or other work location) (effective February 2, 2009), and (31) (practicing in any other manner that gives the Board reasonable cause to believe the health of a patient or the public may be harmed.) (effective February 2, 2009).

The conduct and circumstances described in the Findings of Fact constitute sufficient cause pursuant to A.R.S. § 32-1664(N) to revoke, suspend or take other disciplinary action against Respondent's license to practice as a registered nurse in the State of Arizona.

Respondent admits the Board's Findings of Fact and Conclusions of Law.

The conduct and circumstances described in the Findings of Fact constitute sufficient cause pursuant to A.R.S. §§ 32-1605.01(D) and 32-1664(N) to take disciplinary action against Respondent's license to practice as a registered nurse in the State of Arizona.

Respondent admits the Board's Findings of Fact, Conclusions of Law.

Respondent understands that she has an opportunity to request a hearing and declines to do so. Respondent agrees to issuance of the attached Order and waives all rights to a hearing, rehearing, appeal, or judicial review relating to this Order.

Respondent understands that all investigative materials prepared or received by the Board concerning these violations and all notices and pleadings relating thereto may be retained in the Board's file concerning this matter.

Respondent understands that the admissions in the Findings of Fact are conclusive evidence of a violation of the Nurse Practice Act and may be used for purposes of determining sanctions in any future disciplinary matter.

Respondent understands the right to consult legal counsel prior to entering into the Consent

Agreement and such consultation has either been obtained or is waived.

Respondent understands that this voluntary surrender is effective upon its acceptance by the Executive Director or the Board and by Respondent as evidenced by the respective signatures thereto. Respondent's signature obtained via facsimile shall have the same effect as an original signature. Once signed by Respondent, the agreement cannot be withdrawn without the Executive Director or the Board's approval or by stipulation between Respondent and the Executive Director or the Board. The effective date of this Order is the date the Voluntary Surrender is signed by the Executive Director or the Board and by Respondent. If the Voluntary Surrender is signed on a different date, the later date is the effective date.

Respondent understands that Voluntary Surrender constitutes disciplinary action. Respondent also understands that she may not reapply for re-issuance during the period of Voluntary Surrender.

Respondent agrees that she may apply for re-issuance after the period of voluntary surrender under the following conditions, and must comply with current law at the time of their application for re-issuance:

The application for re-issuance must be in writing and shall contain therein or have attached thereto substantial evidence that the basis for the voluntary surrender has been removed and that the re-issuance of the license does not constitute a threat to the public's health, safety and welfare. The Board may require physical, psychological, or psychiatric evaluations, reports and affidavits regarding

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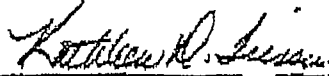
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AZ BOARD OF NURSING

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Respondent as it deems necessary. These conditions shall be met before the application for re-issuance is considered.



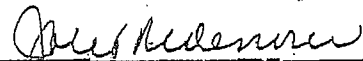
Respondent

Date:

11/15/10

ARIZONA STATE BOARD OF NURSING

SEAL

Joey Ridenour, R.N., M.N., F.A.A.N.  
Executive Director

Dated:

11/19/2010

**ORDER**

Pursuant to A.R.S. § 32-1605.01(D)(5) the Board hereby accepts the Voluntary Surrender of registered nurse license number RN135006, issued to Kathleen Diane Tlesien. This Order of Voluntary Surrender hereby entered shall be filed with the Board and shall be made public upon the effective date of this Consent Agreement. Respondent shall not practice in Arizona under the privilege of a multistate license.

IT IS FURTHER ORDERED that Respondent may apply for re-issuance of said license after a period of three years.

SEAL

ARIZONA STATE BOARD OF NURSING

Joey Ridenour, R.N., M.N., F.A.A.N.  
Executive Director

Dated:

11/19/10

JR/FM:cz

COPY faxed this 12<sup>th</sup> day of November, 2010 to

Lori Curtis, PC  
Davis Miles, PLLC  
FAX # 480-733-3748

COPY mailed this 12th day of November, 2010, by First Class Mail to:

Lori Curtis, PC  
Davis Miles, PLLC  
80 E. Rio Salado Pkwy., Ste. 401  
Tempe, AZ 85281

Kathleen Tiessen  
P.O. BOX 3497  
Arizona City, AZ 85223

By: \_\_\_\_\_  
Legal Secretary

1 GEORGE DEUKMEJIAN, Attorney General  
DORA LEVIN, Deputy Attorney General  
2 3580 Wilshire Boulevard  
Los Angeles, California 90010  
3 Telephone: (213) 736-2004

4 Attorneys for Complainant  
5  
6  
7

8 BEFORE THE  
BOARD OF REGISTERED NURSING  
9 DEPARTMENT OF CONSUMER AFFAIRS  
STATE OF CALIFORNIA  
10

11 In the Matter of the Accusation )  
Against: ) NO. 82-57  
12 )  
KATHLEEN DIANE SERON, R.N. ) STIPULATION  
13 1126 Thomas Way ) AND DECISION  
Delano, California 93215 )  
14 License No. L-295797, )  
15 Respondent. )  
16

17 IT IS HEREBY STIPULATED by and between the parties to  
18 the above entitled matter that the following allegations are true:

19 1. That accusation number 82-57 is presently pending  
20 against respondent, Kathleen Diane Seron, R.N., in the above  
21 matter.

22 2. That respondent has retained James P. Lough, Esq.,  
23 as her counsel in this matter.

24 3. That respondent and her counsel have fully discussed  
25 the charges and allegations contained in said accusation number  
26 82-57.  
27

1           4. That respondent is fully aware of her right to a  
2 hearing on the charges and allegations contained in said  
3 accusation number 82-57, her rights to reconsideration, appeal,  
4 and any and all other rights which may be accorded to her pursuant  
5 to the California Administrative Procedure Act.

6           5. That respondent hereby freely and voluntarily waives  
7 her rights to a hearing, reconsideration, appeal, and any and all  
8 other rights which may be accorded to her by the California  
9 Administrative Procedure Act with regard to said accusation number  
10 82-57.

11           6. That respondent admits the truth of the charges and  
12 allegations contained in paragraphs 1 through 6 of accusation  
13 number 82-57.

14           7. That cause for disciplinary action against the  
15 respondent exists pursuant to the provisions of sections 2750,  
16 2761, subdivision (a), and 2762, subdivision (e), of the Business  
17 and Professions Code.

18           8. That based on the accusation and the foregoing  
19 admissions, it is stipulated that the following penalty may be  
20 imposed:

21           Respondent Kathleen Diane Seron, R.N.'s, license  
22 number L-295797 is revoked; provided, however, that said  
23 revocation is stayed, and the respondent placed on  
24 probation for a period of three years upon the following  
25 terms and conditions:

26           A. Obey All Laws - Respondent shall obey  
27 all laws of the United States, State of



1 California, and its political subdivisions,  
2 and all rules and regulations and laws  
3 pertaining to the practice of nursing in this  
4 state.

5 B. Comply With Probation Program -  
6 Respondent shall fully and completely comply  
7 with the Probation Program established by the  
8 board, and cooperate with representatives of  
9 the board.

10 C. Absence from State - In the event  
11 respondent should leave California to reside  
12 or practice outside of the state, respondent  
13 must notify the board in writing of the dates  
14 of departure and return. Periods of residency  
15 or practice outside the State of California  
16 will not apply to the reduction of this  
17 probationary period.

18 D. Report in Person - Respondent, during  
19 the period of probation, shall report in  
20 person to such meetings of the Board of  
21 Registered Nursing, or its designated  
22 representatives, as directed.

23 E. Submit Written Reports - Respondent,  
24 during the period of probation, shall submit  
25 such written reports and verification of  
26 actions as are required by the board.  
27 /

1 F. Notify Employer - Respondent, if  
2 she be employed in nursing at any time during  
3 the period of probation shall have the  
4 employer submit to the board verification that  
5 the employer understands the conditions of  
6 probation. Respondent may not work for a  
7 nurses' registry.

8 G. Work Where Supervised, Not as  
9 Supervisor - Respondent shall be employed as  
10 an R.N. only in a setting in which full  
11 supervision is provided, and may not function  
12 as a supervisor.

13 H. Be Examined by a Physician:

14 (1) If not employed in nursing,  
15 respondent shall not resume the  
16 practice of nursing in the State of  
17 California until such time as  
18 respondent submits to the board  
19 satisfactory evidence in writing  
20 from her attending physician that  
21 respondent is both physically and  
22 mentally capable of performing her  
23 professional duties as a registered  
24 nurse. Respondent shall insure that  
25 her attending physician knows the  
26 decision of the board in this case  
27 and makes reference thereto in the

1 written statement to the board. If  
2 medically determined, a recommended  
3 treatment program will be instituted  
4 and followed by respondent with the  
5 physician providing written reports  
6 to the board when requested.

7 (2) If employed in nursing,  
8 respondent shall, within 45 days of  
9 the effective date of the decision  
10 of the board, submit to the board  
11 satisfactory evidence that she has  
12 had a medical examination from a  
13 licensed physician. Respondent  
14 shall insure the physician knows the  
15 decision of the board in this case  
16 and that the physician makes  
17 reference thereto in his written  
18 statement to the board. If  
19 medically determined, a recommended  
20 treatment program will be instituted  
21 and followed by the respondent with  
22 the physician providing written  
23 reports to the board when requested.

24 I. Participate in Counseling Program -  
25 Respondent shall participate in an on-going  
26 program of rehabilitative counseling until  
27 such time as the board releases her from

1 treatment. Written progress reports from the  
2 therapist will be required when requested by  
3 the board.

4 J. Abstain from Use of Narcotics -  
5 Respondent shall completely abstain from the  
6 personal use of narcotics, hypnotics,  
7 controlled substances or dangerous drugs, in  
8 any form, except when a bonafide patient of a  
9 licensed physician and when the same are  
10 lawfully prescribed.

11 K. Submit to Tests and Samples -  
12 Respondent, at any time during the period of  
13 probation, shall fully cooperate with the  
14 Board of Registered Nursing or any of its  
15 agents or employees, in their supervision and  
16 investigation of her compliance with the terms  
17 and conditions of this probation; and shall,  
18 when requested, submit to such tests and  
19 samples as the board or its agents or  
20 employees may require for the detection of  
21 alcohol, narcotics, hypnotics, dangerous  
22 drugs, or controlled substances.

23 9. That during the above mentioned period of probation,  
24 and in the event respondent does not comply with the terms and  
25 conditions of probation as set forth above, the Board of  
26 Registered Nursing, after notice to respondent and opportunity to  
27 be heard, may terminate said order of probation or make such other

1 orders modifying the terms of probation herein as the board in its  
2 discretion may deem proper.

3 10. That upon expiration of the above described period  
4 of probation, the stay of revocation of respondent's license shall  
5 become permanent.

6 11. That the admissions herein are for the purpose of  
7 this proceeding only, and shall have no force or effect in any  
8 other case or proceeding.

9 12. That if this stipulation is not accepted in its  
10 entirety by the Board of Registered Nursing, it shall be withdrawn  
11 by the parties and have no effect whatsoever.

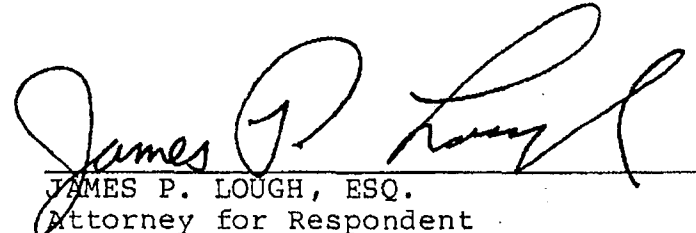
12 GEORGE DEUKMEJIAN, Attorney General  
13 DORA LEVIN, Deputy Attorney General

14  
15 DATED: 11-8-82

  
16 DORA LEVIN  
17 Deputy Attorney General

18 Attorneys for Complainant

19  
20 DATED: 11/4/82

  
21 JAMES P. LOUGH, ESQ.  
22 Attorney for Respondent

23 /  
24 /  
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1 I have discussed the charges and allegations contained  
2 in accusation number 82-57 with my attorney, James P. Lough.  
3 I understand my right to a hearing, as well as my rights to  
4 reconsideration, appeal, and any and all other rights accorded to  
5 me pursuant to the California Administrative Procedure Act.  
6 I hereby freely and voluntarily waive all these rights and agree  
7 to the terms of this stipulation.  
8  
9

10 DATED:

11/3/82

Kathleen Diane Seron R.N.

KATHLEEN DIANE SERON, R.N.  
Respondent

11  
12  
13  
14 DECISION

15 The Board of Registered Nursing hereby adopts the  
16 foregoing stipulation as its decision in this matter. This  
17 decision shall be effective on the 21st day of January,  
18 1983.

19 BOARD OF REGISTERED NURSING  
20

21  
22 DATED: December 20, 1982

By:

Leticia J. [Signature]

Board President

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24  
25  
26  
27 DL:gld  
H-SERON1-8  
10-13-82

1 GEORGE DEUKMEJIAN, Attorney General  
DORA LEVIN,

2 Deputy Attorney General  
3580 Wilshire Boulevard  
3 Los Angeles, California  
4 Telephone: (213) 736-2004

5 Attorneys for Complainant  
6  
7

8 BEFORE THE  
9 BOARD OF REGISTERED NURSING  
10 DEPARTMENT OF CONSUMER AFFAIRS  
STATE OF CALIFORNIA

11 In the Matter of the Accusation ) No. 82-57  
12 Against: )  
13 KATHLEEN DIANE SERON, R.N. ) ACCUSATION  
14 331 N. Greville Place )  
Porterville, California 93257 )  
15 License No. L-295797, )  
Respondent. )

16  
17 Complainant alleges that:

18 1. Complainant, Barbara Brusstar, R.N., is the  
19 Executive Secretary of the Board of Registered Nursing,  
20 (hereinafter referred to as "board"), and makes this accusation  
21 solely in her official capacity.

22 2. On or about August 31, 1978, respondent Kathleen  
23 Diane Seron, (hereinafter referred to as "respondent"), was  
24 issued license number L-295797 by the board. Said license is  
25 now and was at all times mentioned herein in full force and  
26 effect.

1           3. Pursuant to the provisions of section 2750 of the  
2 Business and Professions Code, the board may discipline any  
3 licensee who has committed any of the acts or omissions which  
4 constitute grounds for disciplinary action.

5           4. Respondent is subject to discipline pursuant to  
6 the provisions of sections 2761 (a) and 2762 (e) of the  
7 Business and Professions Code, in that, while employed at  
8 Westside District Hospital, Taft, California, respondent has  
9 committed acts of unprofessional conduct, in that she has  
10 falsified and made grossly incorrect and grossly inconsistent  
11 entries in records pertaining to narcotics and dangerous drugs,  
12 as more particularly alleged hereinafter:

13           A. On or about September 26, 1980, respondent charted  
14 Demerol 100 mg. to patient Ernest A. at 8:50 p.m., 12:55  
15 p.m., and 6 a.m.. In fact, respondent only administered  
16 Demerol once to said patient, at approximately 9 p.m..

17           B. On or about September 28, 1980, respondent charted  
18 Demerol 50 mg. for patient Emory H. at 12:30 a.m., and  
19 6 a.m.. In fact, respondent did not administer Demerol to  
20 said patient at all.

21           C. On or about September 28, 1980, respondent charted  
22 Demerol 50 mg. to patient Floyd G. at 6:30 a.m.. In fact,  
23 respondent did not administer Demerol to said patient at  
24 all.

25           D. On or about September 26, 1980, respondent charted  
26 Demerol 25 mg. for patient Michael F. at 3:30 p.m., 8:30  
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1 p.m., 12:00 a.m. and 5:20 a.m.. In fact, respondent did  
2 not administer said Demerol to said patient.

3 E. On or about October 3, 1980, respondent charted  
4 Demerol 37 1/2 mg. for patient Travis G. at 3:50 p.m.,  
5 8:10 p.m., 12:00 midnight, and 6:50 a.m.. In fact,  
6 respondent did not administer said Demerol to said  
7 patient. Respondent recorded that 3 of the 37 1/2 mg.  
8 doses of Demerol had been withdrawn from 100 mg. vials of  
9 Demerol, when 50 mg. vials were available. Respondent  
10 failed to account for the leftover Demerol.

11 5. Respondent is further subject to discipline  
12 pursuant to the provision of sections 2761 (a) and 2762 (e) of  
13 the Business and Professions Code, in that, while employed at  
14 Lindsay District Hospital, Lindsay, California, respondent has  
15 committed acts of unprofessional conduct, in that she has  
16 falsified and made grossly incorrect, and grossly inconsistent  
17 entries in records pertaining to narcotics and dangerous drugs,  
18 as more particularly alleged hereinafter:

19 On or about September 10, 1980, respondent charted  
20 Demerol 75 mg. for patient Caroline D. at 12:50 and 4:20  
21 a.m.. The patient medication record and the post partum  
22 record each show 1 injection of Demerol at 12:50 a.m.. In  
23 fact, respondent did not administer Demerol to said patient  
24 at either time.

25 B. On or about September 10, 1980, respondent charted  
26 Demerol 75 mg. for patient Ann Z. at 1:00 a.m. and 4:10  
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1 a.m.. In fact, respondent only gave the patient one  
2 injection of Demerol during the night.

3 6. Demerol is a narcotic and a controlled substance,  
4 as defined in sections 11032 and 11055 (c) (14) of the Health  
5 and Safety Code, and a dangerous drug as defined in section  
6 4211 (a) of the Business and Professions Code.

7 WHEREFORE, complainant requests that a hearing be held  
8 on the matters alleged herein, and that following said hearing,  
9 the board issue a decision;

10 1. Suspending or revoking respondent's license; and

11 2. Taking such other action as board deems proper.

12 DATED: March 3, 1982

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Barbara Brusstar  
BARBARA BRUSSTAR, R.N.  
Executive Secretary  
Board of Registered Nursing  
Department of Consumer Affairs  
State of California

Complainant

DL:jmm  
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